REMARKS

The application has been carefully reviewed in light of the Office Action dated March 3. 2006. Applicant thanks Examiner Tran for the thorough review of the application as evidenced by the recent Office Action. Examiner Tran is respectfully requested to reconsider the application in view of the following amendments and remarks set forth herein.

I. CLAIM OBJECTIONS

Claims 1, 10, 16, and 22 were objected to over matters of form. Applicant has amended these claims to address the objections as requested by the Examiner.

II. ALLOWABLE SUBJECT MATTER

In the Office Action, the Examiner noted that Claims 2, 6-7, 9, and 14 would be allowable if rewritten in independent form to incorporate the limitations of their base claims and any intervening claims. Applicant thanks Examiner Tran for his review of the pertinent art and the finding of allowable subject matter in the claims of present application.

Regarding these claims, Applicant respectfully requests that Examiner Tran consider the remarks set forth below relating to the independent claims from which Claims 2, 6-7, 9, and 14 depend.

III. CLAIM REJECTIONS

Claims 1, 3-5, 8, 10-13, 15-21, and 22 were rejected under 35 U.S.C. 102(e) as being unpatentable over ***Wilson et al.*** (U.S. Patent No. 6,853, 842) (hereinafter ***Wilson***).

The System of Wilson

Wilson discloses a system and method for collecting "radio frequency isolation values" using mobile stations in a wireless communication system. In the disclosed system, a broadcast channel is chosen for a broadcast cell/sector, and use of the broadcast channel is disabled in cells/sectors adjacent to the broadcast cell/sector. The base station servicing the broadcast cell/sector broadcasts a signal on the broadcast channel. Mobile stations being serviced by neighboring cells are directed to measure the signal strength of the signal on the broadcast channel as well as the signal strength of a traffic channel servicing an ongoing call. The mobile stations then transmit the signal strength data back to the wireless communication system. These measurements are used to construct an "isolation matrix" showing radio frequency isolation values for the communication system.

Referring to FIG. 1 of ***Wilson***, a broadcast channel is chosen and base station 102 broadcasts a signal on this channel. A mobile station 242 being serviced by base station 108 receives and measures the strength of the broadcast signal. The mobile station 242 also measures the signal strength of a channel being sent by the base station 108 servicing the mobile station's 242 call. These measurements are reported to the wireless communication system which can

then calculate the ratio of the relative signal strengths. (See e.g., ***Wilson*** column 4, line 39 to column 5 line 13.)

Therefore, in ***Wilson***, remote mobile stations which are not in the broadcast cell receive a signal broadcast by the broadcasting cell site and report back its signal strength and the signal strength of a traffic signal sent from the base station serving the remote mobile station. Applicant respectfully submits that the system described by ***Wilson*** fails to anticipate the claims of the present application.

Wilson Fails to Anticipate the Claims of the Present Invention

Amended Claim 1 is reproduced below for reference:

Claim 1. A method for making switch-based C/I measurements for a wireless network including a plurality of cell sites, comprising steps of:

(h) designating a first cell site of the plurality of cell sites as a cell-under-test (CUT) site, and sectors of other cell sites as measurement sectors;

(i) configuring a set of system-unique analog frequencies and a set of system-unique dedicated control channel (DCCH) frequencies corresponding to the CUT site;

(j) broadcasting from the CUT site carrier signals at the set of system-unique analog frequencies and interference signals at the set of system-unique DCCH frequencies;

(k) measuring downlink signal strengths of the carrier signals at mobile stations located within an area serviced by the CUT site;

(l) measuring signal strengths of the interference signals within areas serviced by the measurement sectors;

(m) recording the signal strengths of the carrier and interference signals measured is steps (d) and (e); and

(n) designating another cell site of the plurality of cell sites as the CUT site and repeating steps (b) through (f).

Applicant respectfully submits that ***Wilson*** does not teach at least the elements of Claim 1 highlighted above in bold italics. ***Wilson*** teaches broadcasting a signal from a base station in a "broadcast cell" and receiving the signal at mobile stations being serviced by other base stations. In ***Wilson***, these mobile stations measure the strength of that signal along with the strength of the traffic channel being used to service their telephone calls. Claim 1, however includes a feature of the cell under test broadcasting a signal on a carrier frequency which is measured within an area serviced by the cell under test site and the cell under test broadcasting an interference signal which is measured within areas serviced by the measurement sectors. The claim recites that measurement sectors are "sectors of other cell sites" (other than the cell under test.)

Therefore ***Wilson*** does not teach the claimed invention. That is, the measurements recorded by ***Wilson*** are of a signal strength of an interference signal at a mobile station outside of the broadcasting cell and the signal strength of a carrier signal at that same mobile station received from its servicing base station. Whereas the invention claimed in Claim 1 records the strength of an interference signal at a mobile station outside of the cell under test (broadcasting cell) and the signal strength of a carrier signal received from the cell under test at a mobile station within the cell under test.

Applicant respectfully submits that ***Wilson***, therefore, does not teach each of the elements of Claim 1. As such, Claim 1 and any claims depending therefrom are allowable over ***Wilson***. Applicant requests that the rejection be withdrawn.

Similarly, Claim 10 includes the feature of "broadcasting from the CUT site carrier signals at the set of system-unique analog frequencies and interference signals at

the set of system-unique DCCH frequencies" as well as the feature of "measuring downlink signal strengths of the carrier signals at mobile stations located within an area serviced by the CUT site".

As described above, ***Wilson*** does not disclose these features such that Claim 10 and any claims depending therefrom are allowable over ***Wilson*** for at least this reason.

Amended Claim 16 is reproduced below for reference.

Claim 16. A system for making switch-based C/I measurements for a wireless network, comprising:

a cell-under-test (CUT) site configured to broadcast carrier signals at system-unique analog frequencies and interference signals at system-unique dedicated control channel (DCCH) frequencies;

a plurality of mobile stations configured to receive, measure, and transmit signal strengths of the carrier signals and the interference signals; and

a plurality of measurement sectors configured to receive the transmitted signal strengths.

Applicant respectfully submits that ***Wilson*** does not disclose at least the features of Claim 16 highlighted above in bold italics. As described above, ***Wilson's*** "broadcast cell" transmits an interference signal on its broadcast channel, but the carrier signals measured by the system of ***Wilson*** are broadcast by nearby base stations not the "broadcast cell" (or cell under test).

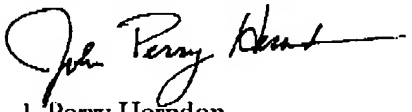
As such, Applicant respectfully requests that the rejection of Claim 16 and any claims depending therefrom be withdrawn.

III. CONCLUSION

The foregoing is submitted as a full and complete response to the Office Action mailed March 3, 2006. Applicant thanks Examiner Tran for his comments and for his consideration of these amendments. Applicant respectfully submits that the pending claims, as amended, are patentable over the cited references, and a Notice of Allowance indicating the same is respectfully requested. The preceding argument in favor of patentability is advanced without prejudice to other bases of patentability.

If Examiner Tran believes any issues remain that can be resolved by a telephone conference, or there are any informalities that can be corrected by an Examiner's amendment, a telephone call to the undersigned at the number listed below to discuss the same is respectfully requested.

Respectfully submitted,



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